UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Fairfield Industries Incorporated d/b/a FairfieldNodal, Plaintiff, vs. Seabed Geosolutions (US) Inc. and Seabed Geosolutions B.V., Defendants.	)))))))))))	Case No. 17-cv-01458 **JURY TRIAL DEMANDED**

COMPLAINT

1. This is an action for patent infringement by Plaintiff Fairfield Industries Incorporated d/b/a FairfieldNodal ("Fairfield") against Defendants Seabed Geosolutions (US) Inc. and Seabed Geosolutions B.V. (collectively, "Seabed") for infringement of United States Patent No. 7,310,287 ("the '287 Patent") and United States Patent No. 7,254,093 ("the '093 Patent") under 35 U.S.C. § 271.

2. The '287 Patent and the '093 Patent claim seismic data collection systems.

PARTIES

3. Fairfield is a Delaware corporation with its principal place of business at 111 Gillingham Lane, Sugar Land, Texas 77478.

4. Defendant Seabed Geosolutions (US) Inc. is a Delaware corporation with its principal place of business at 10350 Richmond Avenue, Suite 800, Houston, Texas 77042.

5. Defendant Seabed Geosolutions B.V., a parent of Defendant Seabed Geosolutions (US) Inc., is a Netherlands corporation with its principal place of business at Dillendburgsingle 69, 2263HW Leidschendam, The Netherlands.

JURISDICTION AND VENUE

6. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. As alleged herein, Seabed has infringed and is continuing to infringe, the '287 Patent and the '093 Patent by manufacturing, selling, offering to sell, and/or using the Manta ocean bottom seismic node systems ("the Manta System") in the United States, or by contributing to or inducing such infringement.

8. This Court has personal jurisdiction over Seabed because Seabed does business in, and has committed infringing acts, in this district.

9. Venue in this district is proper under 28 U.S.C. §§ 1391 and 1400(b).

10. Fairfield informed Seabed of Fairfield's rights under the '287 Patent via a letter dated on or about January 16, 2017. Despite having knowledge of Fairfield's patent rights, as well as knowledge that its Manta products infringe Fairfield's patents, Seabed has continued to infringe.

COUNT I
(INFRINGEMENT OF U.S. PATENT NO. 7,310,287)

11. On December 18, 2007, the '287 Patent, entitled "Method and Apparatus for Seismic Data Acquisition," was duly and legally issued to Fairfield Industries Inc., with Clifford H. Ray, Glenn D. Fisseler, and Hal B. Haygood as inventors. Fairfield is the owner of all right, title, and interest in and to the '287 Patent. A copy of the '287 Patent is attached as Ex. A.

12. Seabed has infringed and is infringing at least claims 1, 3, 4-7, 21, 32-34, 36, 38, 39, 41, 42, 51, and 52 of the '287 Patent, either literally and/or under the doctrine of equivalents, directly and/or indirectly by at least making and/or using the Manta System within the United

States, and/or by contributing to or inducing such infringement by others with the intent to cause infringement of the ’287 Patent.

13. Claim 1 of the ’287 Patent recites:

> “An ocean bottom seismic data collection system comprising:
>
> a. a water tight case having a wall defining an internal compartment;
>
> b. at least one geophone disposed within said case[;]
>
> c. a clock disposed within said case;
>
> d. a power source disposed within said case; and
>
> e. a seismic data recorder disposed with said case,
>
> f. said system having a negative buoyancy;
>
> g. wherein said system is self contained and requires no external communications or controls during recording,
>
> h. wherein the case comprises a first plate having a first periphery and a second plate having a second periphery, wherein the plates are joined along their peripheries by said wall.”

Ex. A at col. 26 ll. 53-67.

14. Claim 1 of the ’287 Patent is infringed by the Manta System, which Seabed at least manufactures in the United States and describes as a “Compact Ocean Bottom Seismic (OBS) single node technology for acquiring seismic data from 0 – 3000 meters of water depth.” *See* Exs. B and C. An exemplary image of the Manta System is provided below:

Ex. B.

15. According to a Seabed patent application, the Manta System (depicted in Fig. 2B below) "consists of a watertight, sealed case … that contains all of the node's internal components" as depicted in Fig. 2A below. Ex. D at [0119].

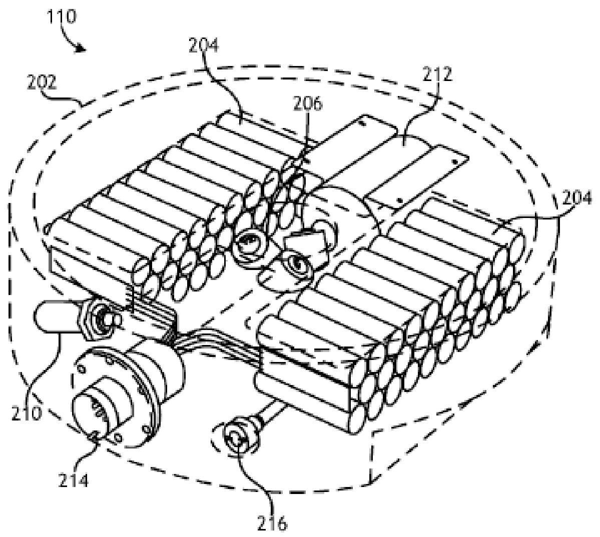
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FIG. 2A

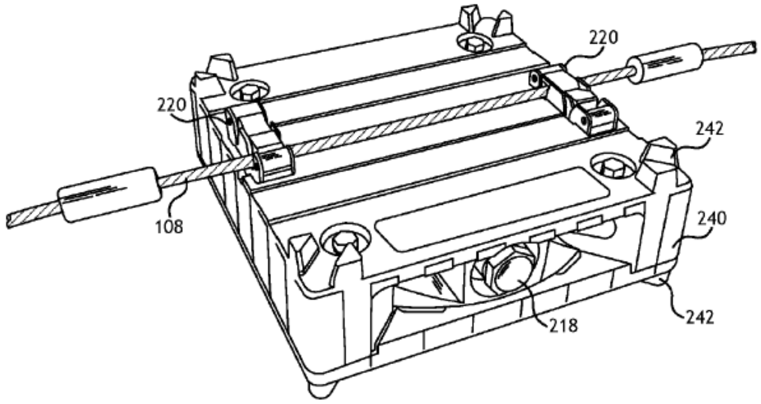
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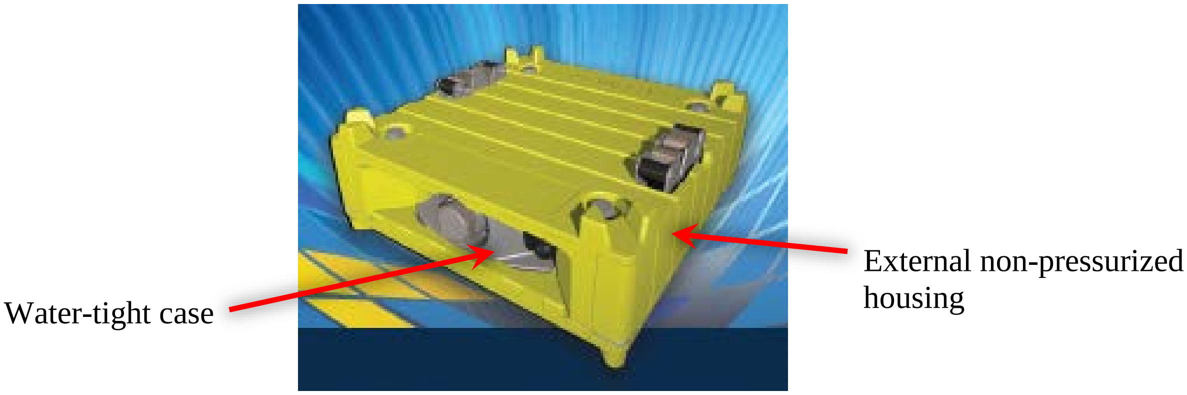
FIG. 2B

Ex. D at Figs. 2A and 2B.

16. In the Manta System, the water-tight case is "surrounded by an external non-pressurized node housing … that may include integrated fenders and/or bumpers." Ex. D at

[0121]. This external housing corresponds to the yellow portion of the Manta System depicted in Seabed's marketing materials:



Ex. B (annotated).

17. Seabed states that the Manta System includes "three omnidirectional geophones." Exs. B and C.

18. Seabed describes the Manta System as offering "[t]ime [s]ynchronization" and "[c]lock [s]tability," indicating the presence of at least one clock within the watertight case. *Id.* In 2015, Seabed offered an optional atomic clock in the Manta System. *See* Ex. B.

19. Seabed states that the Manta System has a power source within the watertight case, describing how the product benefits from "recent advances in rechargeable power-dense battery technology" and has a "battery duration" and "recharge time" Exs. B and C.

20. The Manta System also includes a "Data Recording System" with which to record seismic data. *Id.*

21. According to Seabed, the Manta System is a product with negative buoyancy as it operates "in water depths up to 3000 meters," can be deployed by a "remotely operated underwater vehicle," and is specifically described as an "Ocean Bottom Seismic" product that is "positioned on the seafloor" without any indication of positive buoyancy. *Id.*

22. Seabed further describes the Manta System as "Fully Autonomous," and does not utilize external communications or controls during recording. *Id.* Moreover, Seabed further describes the Manta System as "a compact, autonomous node solution." *See* Ex. E.

23. As demonstrated in the below figure, the Manta System has a case, referred to as a "pressure housing," made up of two plates joined along their peripheries by a wall, which sits inside an external yellow housing:

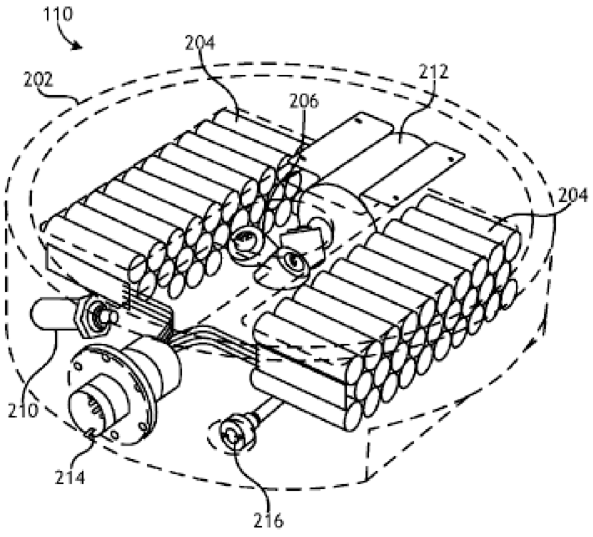


FIG. 2A

Ex. D at Fig. 2A.

24. Claim 3 of the '287 Patent, which recites "[t]he system of claim 1, wherein the each [sic] plate is characterized by a width and the wall is characterized by a height, wherein the width of the plates is greater than the height of the wall," is infringed by the Manta System. Ex. A at col. 27 ll. 3-6.

25. Seabed states the Manta System's dimensions are 350 mm wide, by 350 mm deep, by 130 mm high such that the Manta System is wider than it is tall. *See* Exs. B and C.

26. Claim 4 of the ’287 Patent, which recites “[t]he system of claim 1 wherein the case is substantially symmetrical,” is infringed by the Manta System. Ex. A at col. 27 ll. 7-8.

27. Claim 5 of the ’287 Patent, which recites “[t]he system of claim 1, the case having a first axis and a second axis wherein the case is substantially symmetrical about each of the first and second axes,” is infringed by the Manta System. Ex. A at col. 27 ll. 9-11.

28. Seabed depicts the case of the Manta System as substantially symmetrical about any number of axes, as shown in images depicting the case, such as Figure 2A of Seabed’s patent application. *See* Ex. D at Fig. 2A.

29. Claim 6 of the ’287 Patent, which recites “[t]he system of claim 1, wherein the case is characterized by a height and a diameter wherein the diameter is greater than said height,” is infringed by the Manta System. Ex. A at col. 27 ll. 12-14.

30. Seabed describes the dimensions of the Manta System as 350 mm wide, by 350 mm deep, by 130 mm high, such that the Manta System is wider than it is tall. *See* Exs. B and C.

31. Claim 7 of the ’287 Patent, which recites “[t]he system of claim 6, wherein the height is no more than 50% of the diameter,” is infringed by the Manta System. Ex. A at col. 27 ll. 15-16.

32. Seabed describes the dimensions of the Manta System such that the product’s height (130 mm) is less than 50% of its diameter (350 mm). *See* Exs. B and C.

33. Claim 21 of the ’287 Patent, which recites “[t]he system of claim 1, further comprising a hydro-phone,” is infringed by the Manta System. Ex. A at col. 27 ll. 55-56.

34. Seabed states that the Manta System includes a hydrophone. *See* Exs. B and C.

35. Claim 32 of the ’287 Patent, which recites “[t]he system of claim 1, wherein said power source provides all power to the system while deployed under water,” is infringed by the Manta system. *See* Ex. A.

36. As described above, Seabed describes the Manta System as “Fully Autonomous,” and does not utilize external controls during recording. *See* Exs. B and C. Seabed further describes the Manta System as “a compact, autonomous node solution.” *See* Ex. E.

37. Claim 33 of the ’287 Patent, which recites “[t]he system of claim 1, wherein said power source is a lithium-ion battery,” is infringed by the Manta System. *See* Ex. A.

38. Seabed states that the Manta System may utilize lithium ion battery cells. *See* Ex. D at [0118] (“the battery cells may be lithium-ion battery cells.”).

39. Claim 34 of the ’287 Patent, which recites “[t]he system of claim 1, further comprising an internal control mechanism for controlling all functions of the system while deployed under water,” is infringed by the Manta System. *See* Ex. A.

40. As described above, Seabed describes the Manta System as “Fully Autonomous,” and does not utilize external communications or controls during recording, requiring that it be controlled by an internal control mechanism while deployed under water. *See* Exs. B and C. Seabed further describes the Manta System as “a compact, autonomous node solution.” *See* Ex. E.

41. Claim 36 of the ’287 Patent recites:

“An ocean bottom seismic data collection system comprising:

a. a disk-shaped, water tight case formed of two parallel, circular plates joined along their peripheries by a shallow wall to define an internal compartment;
b. at least one geophone disposed within said case[;]
c. a clock disposed within said case;
d. a seismic data recorder disposed within said case; and

e. a power source disposed within said case,
f. said system having a negative buoyancy."

Ex. A at col. 28 ll. 28-37.

42. Claim 36 of the '287 Patent is infringed by the Manta System, which Seabed describes as a "Compact Ocean Bottom Seismic (OBS) single node technology for acquiring seismic data from 0 – 3000 meters of water depth." *See* Exs. B and C.

43. Seabed depicts the Manta System as disk-shaped, as shown by the figure below.

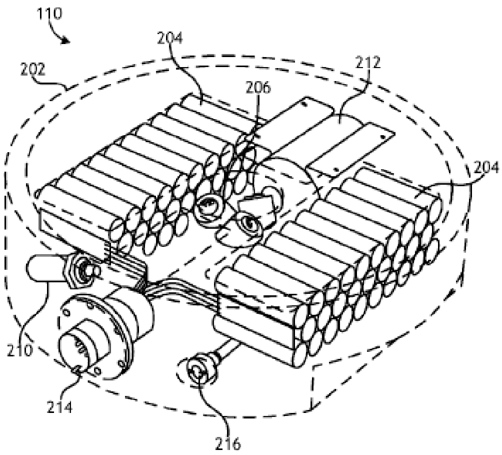


FIG. 2A

Ex. D at Fig. 2A.

44. Seabed describes the Manta System as consisting of "a watertight, sealed case . . . that contains all of the node's internal components." *See* Ex. D at [0120]. As shown in the figure above, the Manta System is made of two parallel circular plates that are joined by the wall of the case. *Id.* Moreover, as discussed above, Seabed describes the dimensions of the Manta System such that the product is wider than it is tall—130 mm height versus a 350 mm diameter plate—indicating that the wall joining the two plates is shallow. *See* Ex. B and C.

45. According to a Seabed patent application, the Manta System (depicted in Fig. 2B below) "consists of a watertight, sealed case … that contains all of the node's internal components" as depicted in Fig. 2A below. Ex. D at [0120].

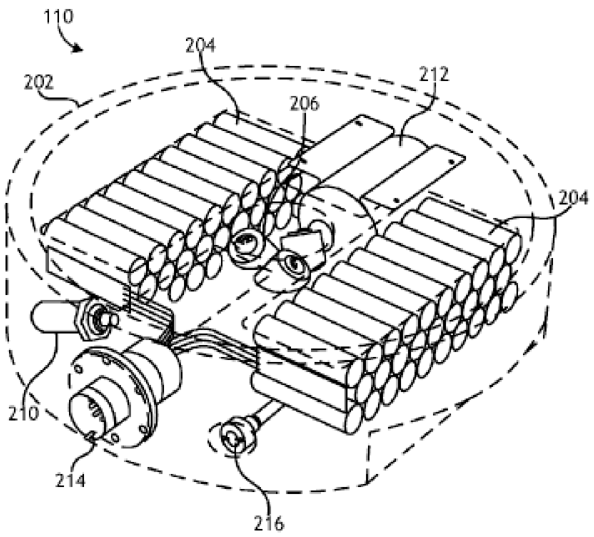

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FIG. 2A

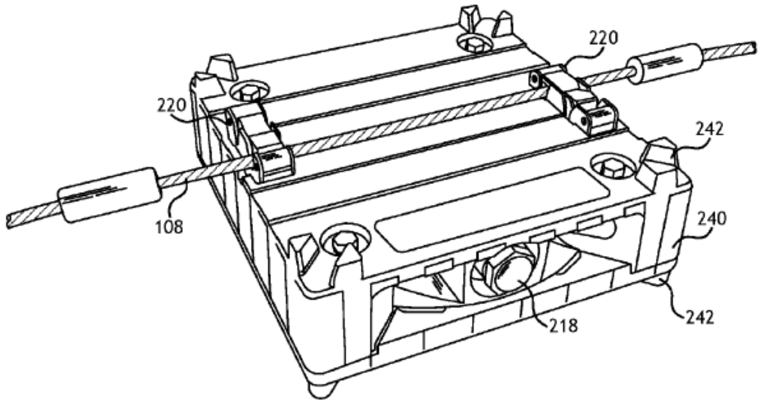
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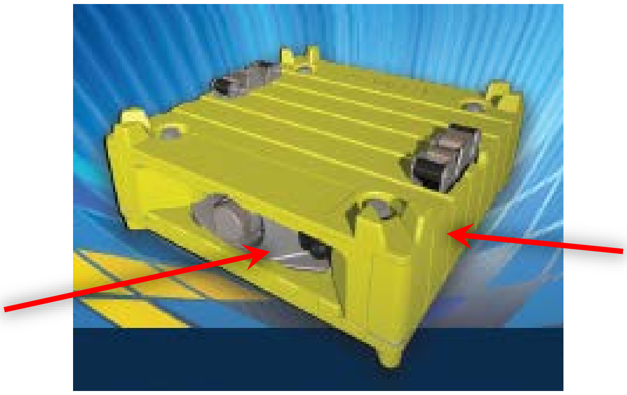
FIG. 2B

Ex. D at Figs. 2A and 2B.

46. In the Manta System, the watertight case is "surrounded by an external non-pressurized node housing … that may include integrated fenders and/or bumpers." Ex. D at

[0121]. This external housing corresponds to the yellow portion of the device depicted in Seabed's marketing materials:



Disk-shaped water-tight case

External non-pressurized housing

Ex. B (annotated).

47. Seabed also describes the Manta System as including "three omnidirectional geophones." *See* Exs. B and C.

48. Seabed describes the Manta System as offering "Time Synchronization" and "Clock Stability," indicating the presence of at least a clock within the watertight case. *Id.* In 2015, Seabed offered an optional atomic clock in the Manta System. *See* Ex. B.

49. The Manta System also includes a "Data Recording System" with which to record seismic data. *Id.*

50. Seabed indicates that the Manta System has a power source in its watertight case, describing how the product benefits from "recent advances in rechargeable power-dense battery technology" and has a "battery duration" and "recharge time" Exs. B and C.

51. According to Seabed, the Manta System is a product with negative buoyancy as it operates "in water depths up to 3000 meters," can be deployed by a "remotely operated underwater vehicle," and is specifically described as an "Ocean Bottom Seismic" product that is "positioned on the seafloor" without any indication of positive buoyancy. *Id.*

52. Claim 38 of the ’287 Patent, which recites “[t]he system of claim 36, wherein the each [sic] plate is characterized by a width and the wall is characterized by a height, wherein the width of the plates is greater than the height of the wall,” is infringed by the Manta System. Ex. A at col. 28 ll. 40-43.

53. Seabed states the Manta System’s dimensions are 350 mm wide, by 350 mm deep, by 130 mm high such that the Manta System is wider than it is tall. *See* Exs. B and C.

54. Claim 39 of the ’287 Patent, which recites “[t]he system of claim 36 wherein the case is substantially symmetrical,” is infringed by the Manta System. Ex. A at col. 28 ll. 44-45.

55. Seabed depicts the case of the Manta System as substantially symmetrical, as shown in images depicting the case, such as Figure 2A of Seabed’s patent application. *See* Ex. D at Fig. 2A.

56. Claim 41 of the ’287 Patent, which recites “[t]he system of claim 36, wherein the case is characterized by a height and a diameter wherein the diameter is greater than said height,” is infringed by the Manta System. Ex. A at col. 28 ll. 49-51.

57. Claim 42 of the ’287 Patent, which recites “[t]he system of claim 41, wherein the height is no more than 50% of the diameter,” is infringed by the Manta System. Ex. A at col. 28 ll. 52-53.

58. Seabed describes the dimensions of the Manta System as 350 mm wide, by 350 mm deep, by 130 mm high, such that the Manta System is wider than it is tall and such that the height (130 mm) is less than 50% of its diameter (350mm). *See* Exs. B and C.

59. Claim 51 of the ’287 Patent, which recites “[t]he system of claim 36, wherein said power source provides all power to the system while deployed under water,” is infringed by the Manta System. Ex. A at col. 29 ll. 16-18.

60. As described above, Seabed describes the Manta system as "Fully Autonomous," and does not utilize external controls or power sources. *See* Exs. B and C. Seabed further describes the Manta System as "a compact, autonomous node solution." *See* Ex. E.

61. Claim 52 of the '287 Patent recites:

"An ocean bottom seismic data collection system comprising:

a. a water tight case, wherein the case comprises a first plate having a first periphery and a second plate having a second periphery, the first and second plates joined along their peripheries by a wall so as to define an internal compartment;

b. at least one geophone disposed within said case[;]

c. a clock disposed within said case;

d. a power source disposed within said case; and

e. a seismic data recorder disposed within said case,

f. said case having a negative buoyancy;

g. wherein said system is self contained and all electrical wiring for the system is contained within said case."

Ex. A at col. 30 ll. 1-16.

62. Claim 52 is infringed by the Manta System, which Seabed describes as a "Compact Ocean Bottom Seismic (OBS) single node technology for acquiring seismic data from 0 – 3000 meters of water depth." *See* Exs. B and C. An exemplary image of the Manta System is provided below:

Ex. B.

63. According to a Seabed patent application, the Manta System (depicted in Fig. 2B below) "consists of a watertight, sealed case … that contains all of the node's internal components" as depicted in Fig. 2A below. Ex. D at [0120].

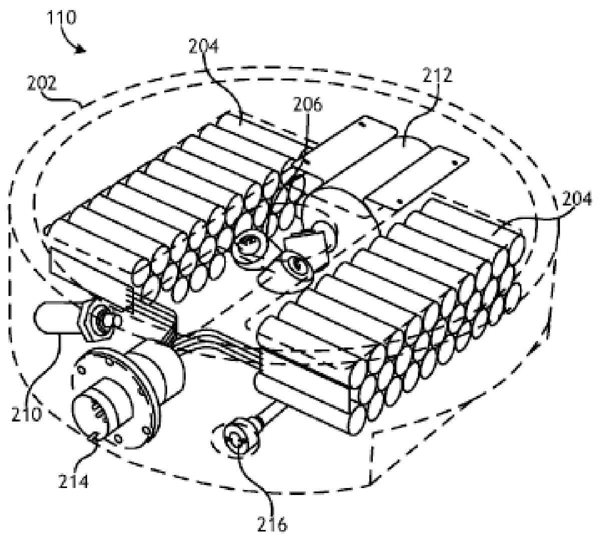

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FIG. 2A

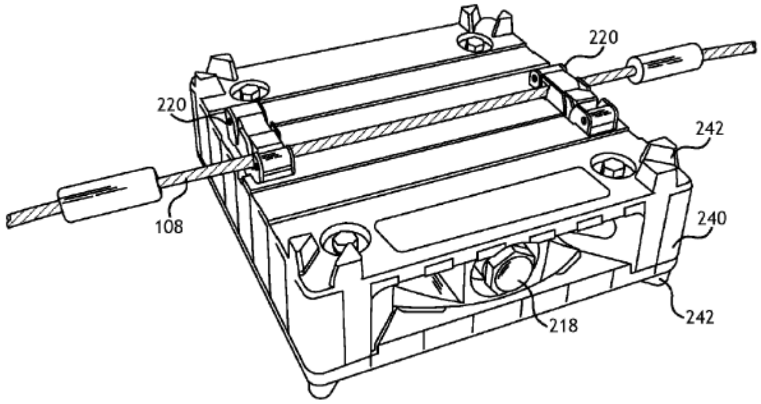
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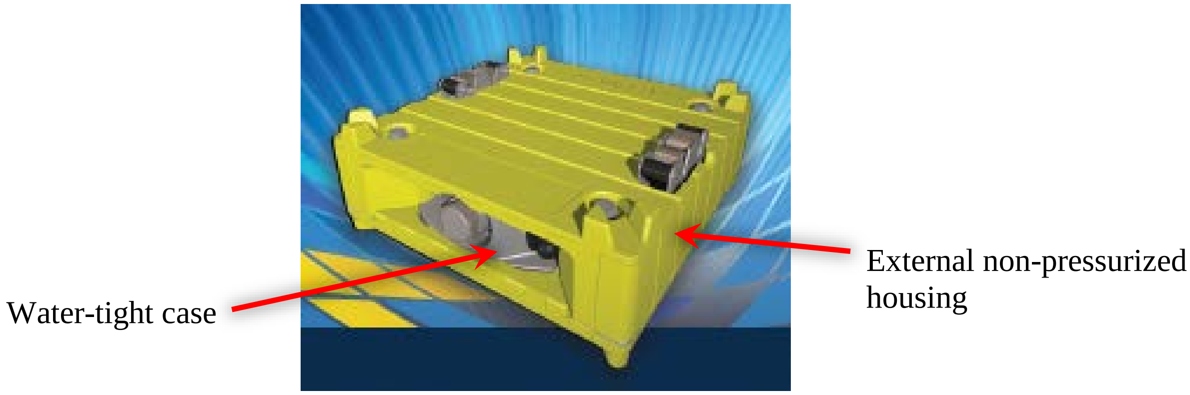
FIG. 2B

Ex. D at Figs. 2A and 2B.

64. In the Manta System, the watertight case is "surrounded by an external non-pressurized node housing … that may include integrated fenders and/or bumpers." Ex. D at [0121]. This external housing corresponds to the yellow portion of the device depicted in Seabed's marketing materials:



Ex. B (annotated).

65. As shown in the below figure, the Manta System has a case, referred to as a "pressure housing," made up of two plates joined along their peripheries by a wall, which sits inside an external yellow housing:

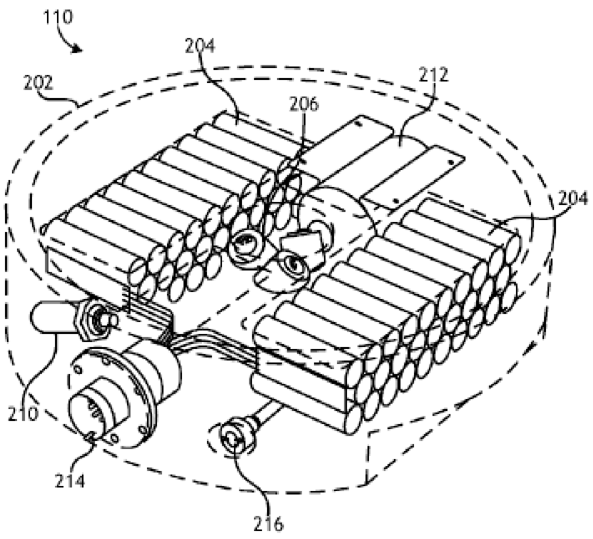


FIG. 2A

Ex. D at Fig. 2A.

66. Seabed indicates that the Manta System includes "three omnidirectional geophones." *See* Exs. B and C.

67. Seabed describes the Manta System as offering "Time Synchronization" and "Clock Stability," indicating the presence of at least a clock within the case. *Id.* In 2015, Seabed offered an optional atomic clock in the Manta System. *See* Ex. B.

68. Seabed indicates that the Manta System has a power source in its case, describing how the product benefits from "recent advances in rechargeable power-dense battery technology" and has a "battery duration" and "recharge time" *See* Exs. B and C.

69. The Manta System also includes a "Data Recording System" with which to record seismic data. *Id.*

70. According to Seabed, the Manta System is a product with negative buoyancy as it operates "in water depths up to 3000 meters," can be deployed by a "remotely operated

underwater vehicle," and is specifically described as an "Ocean Bottom Seismic" product that is "positioned on the seafloor" without any indication of positive buoyancy. *Id.*

71. Seabed further describes the Manta System as "Fully Autonomous," and does not utilize external communications or controls during recording. *Id.* Moreover, Seabed further describes Manta as "a compact, autonomous node solution." *See* Ex. E

72. Defendant's infringement of the '287 Patent is and has been willful, has caused and will continue to cause Fairfield to suffer damages, and has caused and will continue to cause Fairfield irreparable harm for which there is no adequate remedy at law.

73. Many additional details concerning the operation of Seabed's Manta System are presently unavailable as the Manta System is not available to Fairfield. Further discovery would be required to discern whether additional claims of the '287 patent, or any other patent, may be infringed. Furthermore, additional details concerning the making, use, offer for sale, sale, exportation, or importation of the Manta System may only be learned through further discovery which may lead to additional infringement claims.

COUNT II
(INFRINGEMENT OF U.S. PATENT NO. 7,254,093)

74. On August 7, 2007, the '093 Patent entitled "Ocean Bottom Seismometer Package with Distributed Geophones" was duly and legally issued to Fairfield Industries Inc., with Clifford H. Ray and Glenn D. Fisseler as inventors. Fairfield is the owner of all right, title, and interest in and to the '093 Patent. A copy of the '093 Patent is attached as Ex. F.

75. Seabed has infringed and is infringing one or more of the claims of the '093 Patent, either literally and/or under the doctrine of equivalents, directly and/or indirectly by at least making and/or using the Manta System within the United States, and/or by contributing to or inducing such infringement by others with the intent to cause infringement of the '093 Patent.

76. Claim 1 of the ’093 Patent recites:

> “A seismic data collection unit comprising:
>
> a. a water tight case having a wall defining an internal compartment, wherein the case is substantially symmetrical about an axis of symmetry so as to define a center of gravity for said case along said axis;
>
> b. at least two geophones disposed within said case, wherein each geophone is offset from said axis by a first offset distance and each geophone is offset from one another;
>
> c. a clock disposed within said case;
>
> d. a power source disposed within said case; and
>
> e. a seismic data recorder disposed within said case;
>
> f. wherein said case is disk-shaped and is formed by two parallel, circular plates joined along their peripheries by said wall and said axis of symmetry passes through the center of each of said plates.”

Ex. F at col. 9 l. 58-col. 10 l. 7.

77. Claim 1 of the ’093 Patent is infringed by the Manta System, which Seabed describes as a “Compact Ocean Bottom Seismic (OBS) single node technology for acquiring seismic data from 0 – 3000 meters of water depth.” Exs. B and C. An exemplary image of the Manta System is provided below:

Ex. B.

78. According to a Seabed patent application, the Manta System (depicted in Fig. 2B below) "consists of a watertight, sealed case … that contains all of the node's internal components" as depicted in Fig. 2A below. Ex. D at [0120].

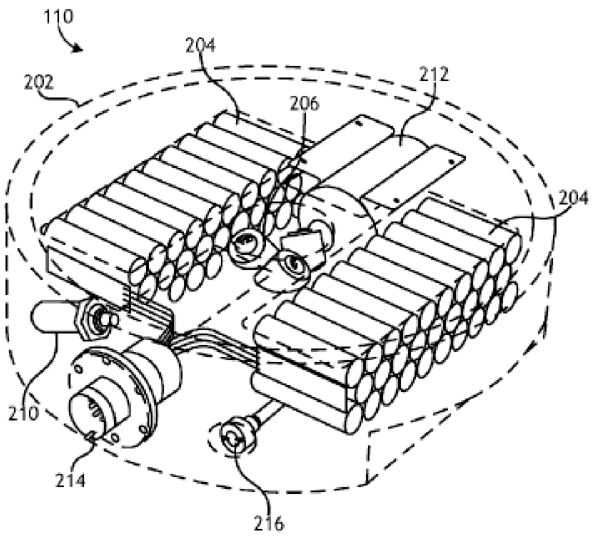

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FIG. 2A

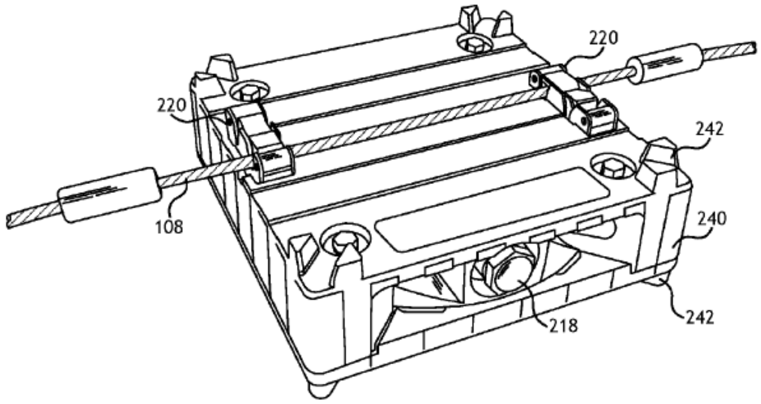
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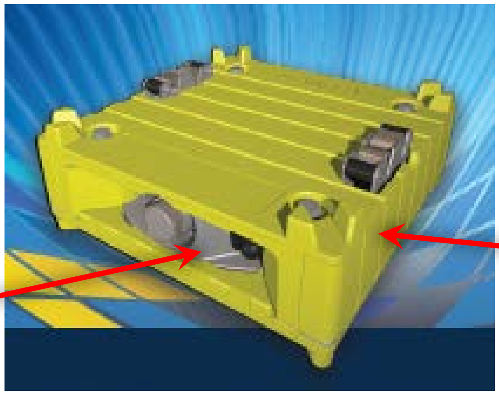
FIG. 2B

Ex. D at Figs. 2A and 2B.

79. In the Manta System, the water-tight case is "surrounded by an external non-pressurized node housing … that may include integrated fenders and/or bumpers." Ex. D at

[0121]. This external housing corresponds to the yellow portion of the device depicted in Seabed's marketing materials:



Disk-shaped water-tight case

External non-pressurized housing

Ex. B (annotated).

80. As demonstrated in the below figure, the Manta System has a disk-shaped case, referred to as a "pressure housing," made up of two plates joined along their peripheries by a wall, which sits inside an external yellow housing:

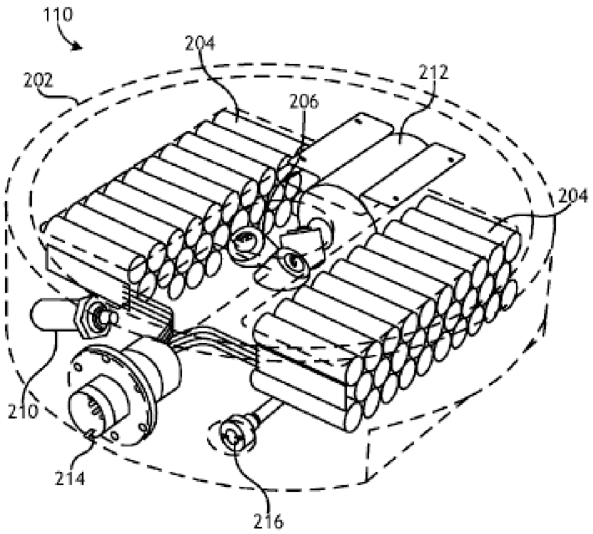


FIG. 2A

Ex. D at Fig. 2A.

81. Seabed depicts the case of the Manta System as substantially symmetrical about any number of axes, as shown in images depicting the case, such as Figure 2A of Seabed's patent application. *See* Ex. D at Fig. 2A.

82. Seabed depicts the Manta System in the figure below as balanced on a cable such that the water-tight case must be substantially symmetrical about an axis of symmetry so as to define a center of gravity for said case along said axis. *See id.*

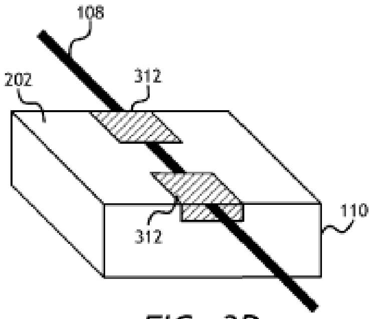


FIG. 3D

Ex. D at Fig. 3d; *see also* Fig. 3C.

83. Seabed states that the Manta System includes "three omnidirectional geophones." *See* Exs. B and C. Seabed's depiction of the Manta System in the following figure shows that the three geophones (labeled "206") are positioned such that they are offset from the central axis and offset from one another:

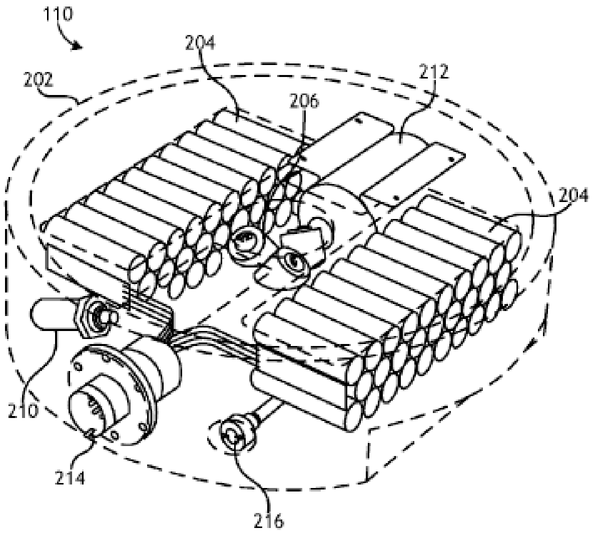


FIG. 2A

Ex. D at Fig. 2a.

84. Seabed describes the Manta System as offering "Time Synchronization" and "Clock Stability," demonstrating the presence of at least a clock within the node's case. *Id.* In 2015, Seabed offered an optional atomic clock in the Manta System. *See* Ex. B.

85. Seabed demonstrates that the Manta System has a power source in its case, describing how the product benefits from "recent advances in rechargeable power-dense battery technology" and has a "battery duration" and "recharge time" *See* Exs. B and C.

86. The Manta System also includes a "Data Recording System" with which to record seismic data. *Id.*

87. Claim 2 of the '093 Patent, which recites "[t]he unit of claim 1, wherein the offset distance for each geophone is equivalent," is infringed by the Manta System. Ex. F at col. 10 ll. 8-9.

88. Seabed's depiction of the geophones in the Manta System shows that the offset distance for each geophone is equivalent. *See* Ex. D at Fig. 2A.

89. Claim 3 of the '093 Patent, which recites "[t]he unit of claim 2, further having a circumference defined in said compartment about the vertical axis, wherein the circumference has a radius equivalent to the offset distance and wherein said geophones are disposed on said circumference," is infringed by the Manta System. Ex. F at col. 10 ll. 10-14.

90. Seabed depicts the Manta System's geophones (labeled "206"), in Figure 2A above, as being disposed on a circumference about a vertical axis. *See* Ex. D at Fig. 2A.

91. Claim 4 of the '093 Patent, which recites "[t]he unit of claim 3, wherein the geophones are symmetrically spaced on said circumference," is infringed by the Manta System. Ex. F at col. 10 ll. 15-16.

92. Seabed depicts the Manta System's geophones (labeled "206"), in Figure 2A above, as being symmetrically spaced on a circumference. *See* Ex. D at Fig. 2A.

93. Claim 6 of the '093 Patent, which recites "[t]he unit of claim 4, wherein the unit has three geophones that are symmetrically spaced 120 degrees apart on said circumference," is infringed by the Manta System. Ex. F at col. 10 ll. 20-23.

94. Seabed depicts the Manta System's geophones (labeled "206"), in Figure 2A above, as being equivalently spaced on a circumference, which by definition would require that they be spaced 120 degree apart as the entire circumference would equal 360 degrees. *See* Ex. D at Fig. 2A.

95. Claim 10 of the '093 Patent, which recites "[t]he unit of claim 1 wherein said geophones are rigidly attached within said case between said plates," is infringed by the Manta System. Ex. F at col. 10 ll. 33-34.

96. As discussed above, Seabed describes the Manta System as "consist[ing] of a watertight sealed case or pressure housing that contains all the node's internal components," which include "three omnidirectional geophones." *See* Exs. B, C, and D. While Fairfield does not possess confidential Seabed information regarding the method of attachment of geophones within the Manta System, Seabed states that the Manta System provides "[b]etter signal-to-noise ratio equates to a more robust dataset," suggesting that the geophones are rigidly attached. Ex. E at 6.

97. Claim 12 of the '093 Patent, which recites "[t]he unit of claim 1, further defining a horizontal plane, wherein said geophones are rigidly attached in the same horizontal plane," is infringed by the Manta System. Ex. F at col. 10 ll. 38-40.

98. As discussed above, Seabed's depiction of the geophones in the Manta System shows that the geophones are rigidly attached in the same horizontal plane. *See* Ex. D at Fig. 2A.

99. Claim 18 of the '093 Patent, which recites "[t]he unit of claim 1, wherein said case has a center of gravity and said vertical axis passes through said center of gravity," is infringed by the Manta System. Ex. F at col. 10 ll. 58-60.

100. As discussed above, Seabed depicts the Manta System as balanced on a cable such that the vertical axis passes through a center of gravity. *See* Ex. D at Fig. 4D.

101. Seabed's infringement of the '093 Patent is and has been willful, has caused and will continue to cause Fairfield to suffer damages, and has caused and will continue to cause Fairfield irreparable harm for which there is no adequate remedy at law.

102. Many additional details concerning the operation of Seabed's Manta Systems are presently unavailable as the products are not publicly available and further discovery would be required to discern whether additional claims of the '093 patent may be infringed. Furthermore,

additional details concerning the manufacture, use, offering for sale, sales, exportation, or importation of the Manta System may only be learned through further discovery which may lead to additional infringement claims.

DEMAND FOR A JURY TRIAL

103. Fairfield hereby demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Fairfield requests that this Court enter judgment in its favor and grant the following relief:

a) A judgment that Seabed has infringed the asserted claims of the ’287 and ’093 Patents, and/or contributed to the infringement of the asserted claims of the ’287 and ’093 Patents, and/or induced infringement of the ’287 and ’093 Patents, both literally and under the doctrine of equivalents;

b) An award to Fairfield of damages in accordance with 35 U.S.C. § 284, including all damages adequate to compensate it for Seabed’s infringement, but in no event less than a reasonable royalty, such damages to be determined by a jury, and if necessary to adequately compensate Fairfield, an accounting, and that such damages be awarded to Fairfield, together with interest, including the pre-judgment and post-judgment interest, and costs;

c) A preliminary and permanent injunction enjoining Seabed, its affiliates, subsidiaries, officers, directors, agents, employees, representatives, licensees, successors, assigns, and all those acting in concert or participation with any of them, from committing further infringement of the ’287 and ’093 Patents;

d) A judgment that that Seabed has willfully and deliberately committed acts of patent infringement, and an award to Fairfield of treble damages in light of Seabed's willful infringement;

e) A determination that that this is an "exceptional case" pursuant to 35 U.S.C. § 285 and an award to Fairfield its reasonable attorneys' fees, costs, and expenses that it incurs in prosecuting this action;

f) An award to Fairfield its costs, pre-judgment interest, and post-judgment interest; and

g) An award to Fairfield of such other and further relief as the Court deems just and proper.

Dated: May 11, 2017

Respectfully submitted,

________*/s/ William P. Jensen*______

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